


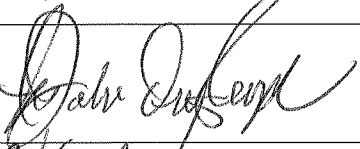



Time Critical Removal Request

NEDO Sign-Off

Facility: WARREN STEEL HOLDINGS

<u>TITLE</u>	<u>SIGNATURE</u>	<u>DATE</u>
DMWM Inspector		2/4/2016
DMWM ES3		2/4/2016
DMWM Supervisor		2/8/2016
DMWM Manager		2/8/2016
NEDO Assistant Chief or NEDO Chief		2/8/16

**OHIO EPA
TIME-CRITICAL REMOVAL ACTION
REFERRAL PACKAGE**

1. Site Location and Responsible Party Information

A. Site Name: Warren Steel Holdings (WSH)

B. Location: 4000 Mahoning Ave., Warren OH 44483

C. Owner(s)/Operator(s):
Warren Steel Holdings, LLC
(Same address as above)

Thad Florence, General Counsel
Optima Specialty Steel, Inc.
200 S. Biscayne Blvd.
55th Floor
Miami, Florida 33131
t.florence@optimasteel.com
305-357-4436
305-375-7560 office
954-614-3262

D. Brief description of steps taken to compel responsible party(ies) to conduct site remediation:

- USEPA Inspection September 17&18, 2013
- OEPA Inspection August 21&26, 2015
- OEPA NOV January 12, 2016
- TRO January 20, 2016
- USEPA NOV January 21, 2016
- PI January 29, 2016

2. Site Description and Background Information

A. Description of past or present operations and how wastes were generated:

This is a closed steel production facility. Wastes generated when in production included the following.

- Quench water
- Slag
- Electric arc furnace (EAF) dust – K061
- Drop-out box waste
- Mill scale
- Used oil
- Used lamps
- Aerosol cans from spray paint to mark billets – D001

B. Site Characteristics

Site layout (size, number of buildings, topography, etc.):

This is about a 400 acre fairly flat site which is bounded on the north by the Warren Outerbelt, on the east by Mahoning Avenue, on the south by North River Road and the Mahoning River, and on the west by residential property. Ohio Star Forge purchased some land at the northwest corner of the site but accesses their property through WSH property and the WSH main gate. The northeast portion of the site is leased to Scrap Metal Services which utilizes the same access road from Mahoning Avenue but is located on the north side of the main entrance road prior to WSH main gate. Stein Inc. leases property located north of North River Road in the central part of the WSH site just south of the Melt Shop. It is also accessed through the main entrance road and WSH main gate. There are numerous buildings on the property, most left over from when it was Copperweld and abandoned since they left the site. Some of these Copperweld buildings have been demolished.

Quantity and type of wastes and/or hazardous substances:

Hazardous Wastes known to currently be on-site include:

- EAF dust from baghouse emptying – 6 vac boxes and 3 roll-off boxes ~25 cu yds each, located east and south of the baghouse, oldest date 12/2/2015
- EAF dust remaining in baghouse – the Operations Manager estimated about 2 more boxes of dust needs to be vacuumed out of the APC equipment
- Fugitive EAF dust on the ground surface to the east and south of baghouse
- Spent Aerosol Cans – 2 ½ 55-gallon drums located in the 21" Mill at the east end, oldest date 10/21/2015
- Universal Wastes – a few boxes in the Craft Shop

Other wastes currently on-site include:

- Unidentified wastes in ~10 containers (totes and drums) gathered in the 12" Mill
- Unidentified wastes in numerous waste piles outside on the southwest portion of the site
- Unidentified wastes in abandoned equipment pits in the abandoned Copperweld buildings
- PCB contaminated oil in an in-ground tank at the west end of the 36" Mill
- ~13 abandoned transformers that may or may not contain PCBs, some are leaking, in various locations around the site
- Asbestos in Sheds 2 & 3
- Mold in abandoned Copperweld Administration Building
- 2 used oil tanks, unknown if they have content

Abandoned materials on-site include:

- Super sacks of materials in the supply building north of the Melt Shop
- Drums of virgin oil in the supply building north of the Melt Shop
- Water and wastewater treatment chemicals including totes of acids, various locations around the site
- Petroleum tanks around the site, may or may not have content
- Radiation sources – 3 from the Caster Building and 1 from the Lab, these have been locked in a cabinet somewhere on the site

Analytical data or other documentation on chemical characterization of wastes

present (attach analytical):

Enclosed are waste determinations for the following.

- EAF dust (K061 and 18.8 mg/L lead)
- Slag (non-hazardous)
- Caster cooling water (non-hazardous)
- Lime/Crane dust (non-hazardous)
- Drop out box waste (non-hazardous)

Condition of containers:

The condition of hazardous waste boxes storing K061 is good with the oldest dated 12/2/15. The condition of the 3 drums holding D001 aerosol cans is good with the oldest dated 10/21/15.

Proximity of population and population density:

WSH is located between the northern city limits of Warren and the Warren Outerbelt. The population in 2013 was 40,768 (100% urban, 0% rural). It appears to be mostly residential to the south and east of the site.

3. Threats to Public Health and the Environment

A. Description of potential exposure to humans, animals or the food chain from hazardous substances or contaminants:

The site is not well secured. Humans and animals can access the site from many locations. The shared entrance brings traffic from other businesses through the site without barriers to the waste locations. Wandering humans or animals can access the abandoned pits in the abandoned Copperweld buildings as well as the undetermined waste piles and undetermined materials.

B. Actual or potential for release present:

There is potential for release and environmental contamination from the fugitive EAF dust around the baghouse, from the undetermined wastes in the multiple waste piles on the southwest part of the site, from the undetermined wastes in the abandoned equipment pits, from the PCB contaminated oil pit, and from the containers of abandoned materials, oil, EAF dust, and aerosol cans on-site. Also there is potential for releases from the abandoned transformers, the used oil tanks, the petroleum tanks, and from the water and wastewater treatment chemical containers.

C. Threat of fire or explosion:

There are 2 ½ drums of D001 ignitable aerosol cans in the 21" Mill at the east end.

4. Assessment of Environmental Hazards and Proposed Response Actions

A. Description of hazards (real or potential) posed by site and what actions should be undertaken to reduce or eliminate hazard:

Based on the hazards described in number 3 above the following response actions are recommended.

- Remove 2 ½ drums of D001 aerosol can wastes
- Remove 9 boxes of EAF K061 waste
- Vacuum out APC equipment
- Perform closure of area to east and south of baghouse

- Identify and close any hazardous waste piles on the southwest part of site
- Identify and close any equipment pits containing hazardous waste
- Identify and remove any abandoned hazardous materials
- Deal appropriately with other program concerns (transformers, wwtp overflows, radiation sources, solid wastes, etc.)

5. *Chronology of Events*

1. USEPA Inspection September 17&18, 2013
2. OEPA Inspection August 21&26, 2015
3. OEPA NOV January 12, 2016
4. OEPA NEDO Site Visit – January 13, 2016
5. TRO January 20, 2016
6. USEPA NOV January 21, 2016
7. PI January 29, 2016

6. *Index of Documents*

1. E-Mail regarding WSH Obligations – 1/12/16
2. OEPA RCRA NOV – 1/12/16
3. OEPA NEDO NOV – 1/13/16
4. USEPA RCRA NOV – 1/21/16
5. E-Mail with Waste Determinations – 12/14/15
6. E-Mail with PCB Oil Pit Analytical – 11/10/15
7. E-Mail with Temporary CRO Form – 12/4/15
8. Site Visit Notes – 1/13/16

7. *Extenuating or Mitigating Circumstances*

WSH did not appear in court to represent themselves for the TRO or PI hearings. They have not been responsive to the EH&S Manager's requests to address their environmental issues.

8. *Contacts*

District Office: Sherry Slone, NEDO, DMWM - HW

Central Office: Mitch Matthews, CO, DMWM, Enforcement Mgr.

9. Signatures

Signed: 

Date: 2/4/2016

Approved: _____

Date: _____